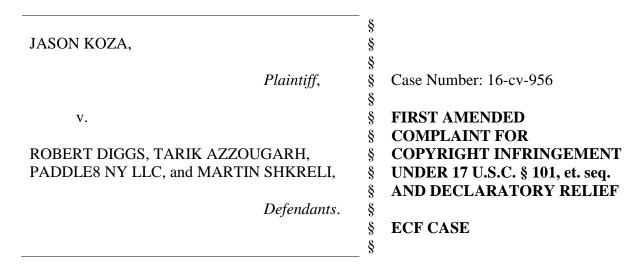
Peter Scoolidge Scoolidge Kleiman LLP 315 W. 36th Street New York, NY 10018 (212) 913-9455 Attorneys for Plaintiff

IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK



INTRODUCTION

Once upon a time a great artist named Jason Koza lived in Copiague, New York. Mr. Koza, one of the most talented portrait artists of the Second Millennium, is also a musician and a devoted fan of the New York-based hip-hop group known as the Wu-Tang Clan. In late 2013 and early 2014, Mr. Koza created portraits of each original member of the Wu-Tang Clan and submitted digital images of the portraits to the WuDisciples.blogspot.com website for public display. Mr. Koza was happy when his work appeared on the website and went about his life for the next approximately two years, continuing to create more original works of art. On January 29, 2016, Mr. Koza became aware of a news article about a new Wu-Tang Clan album titled "Once Upon a Time in Shaolin," the sole copy of which was reportedly sold to Martin Shkreli for approximately \$2 million. The album included a 174-page book, which contained copies of

Mr. Koza's Wu-Tang Clan member portraits. This story only has one problem: Mr. Koza never granted a license for his works to be copied or displayed anywhere other than the WuDisciples.blogspot.com website.

NATURE OF THE CASE

- 1. This is an action for copyright infringement pursuant to the Copyright Act (Title 17, United States Code) and breach of contract pursuant to the laws of New York State.
- 2. Plaintiff also states a claim for declaratory relief under 28 U.S.C. § 2201(a).

JURISDICTION AND VENUE

- 3. This Court has subject matter jurisdiction over this action pursuant to 28 U.S.C. §§ 1331 and 1338(a) because it arises under the laws of the United States, specifically the Copyright Act. This Court also has supplemental jurisdiction under 28 U.S.C. § 1367.
- 4. This Court has personal jurisdiction over Defendants under at least N.Y. C.P.L.R. § 302(a)(1)-(3) in that Defendants have, directly or through intermediaries, committed acts within New York giving rise to this action and/or have established minimum contacts with New York such that the exercise of jurisdiction would not offend traditional notions of fair play and substantial justice. Upon information and belief, Defendants Robert Diggs, Tarik Azzougarh, and/or Paddle8 caused the infringing copies of Mr. Koza's works to be delivered to a law office in New York County, New York by mail or courier service to be picked up by Defendant Martin Shkreli. Defendants Diggs and Azzougarh have transacted business within the State of New York by contracting with Defendant Shkreli to provide the infringing copies to Defendant Shkreli in New York. Upon information and belief, Defendants have transacted business within the State of New York by contracting with Paddle8 to distribute copies of Mr. Koza's work. Upon information and belief, Defendants have derived substantial revenues from their infringing acts occurring within the State of New York and within this District.

5. Venue is proper in this judicial district pursuant to 28 U.S.C. §§ 1391(b)-(d) and 1400(a).

PARTIES

- 6. Plaintiff Jason Koza is an adult individual residing in Suffolk County, New York.
- 7. Upon information and belief, Defendant Robert Diggs is an adult individual residing in Los Angeles County, California.
- 8. Defendant Martin Shkreli is an adult individual residing in New York County, New York.
- 9. Upon information and belief, Mr. Shkreli is currently in possession of the sole physical infringing copies of Mr. Koza's works, which are located in New York County, New York.
- 10. Upon information and belief, Defendant Tarik Azzougarh is an adult individual residing in Marrakech, Morocco.
- 11. Paddle8 NY LLC is a New York limited liability company with a principal place of business in New York County, New York.

BACKGROUND

- 12. In the early 1990s, the Wu-Tang Clan emerged from Staten Island, New York, as a revolutionary musical act in the genre of hip-hop. The Wu-Tang Clan was founded by Mr. Diggs, one of the world's finest performing artists, also known as "the RZA."
- 13. The group's first album, "Enter the Wu-Tang: 36 Chambers," was recorded by nine members: the RZA, the GZA, Ol' Dirty Bastard, Method Man, Inspecta Deck, Raekwon, Ghostface Killa, Masta Killa, and U-God.
- 14. The Wu-Tang Clan's music was a combination of inner-city American zeitgeist, Five Percenter dogma, social commentary, and cutting-edge production.

- 15. The contribution of the Wu-Tang Clan to American music and culture is immeasurable.
- 16. The Wu-Tang Clan, collectively and as solo artists, have sold over ten million albums in the United States alone.
- 17. The visual artworks featured in Wu-Tang Clan album covers and liner notes have often been an important element of the albums they accompany. For example, a solo album by the GZA titled "Liquid Swords" featured cover art depicting comic-book characters engaged in a sword fight on a chessboard.
- 18. In 1982, Mr. Koza was born in West Islip, New York. Mr. Koza grew up in Copiague, New York, and excelled in music and the visual arts.
- 19. In 2005, Mr. Koza was awarded a degree in illustration from the Fashion Institute of Technology one of New York's most well known design schools.
- 20. Mr. Koza is a portrait artist who primarily creates ink-on-paper portraits. Mr. Koza has rendered portraits of famous individuals from Abraham Lincoln to David Bowie.
- 21. Mr. Koza's portraits sometimes incorporate a likeness of the subject's face into fanciful imagery connected with the subject's art or personal life. For example, one of his portraits depicts a young Paul McCartney in the mouth of a giant walrus; a reference to the Beatles song titled "I Am the Walrus." Another depicts Jim Morrison with the body of a lizard and wearing a crown; a reference to Morrison's nickname "The Lizard King."
- 22. Mr. Koza is also a musician and has played the guitar and bass in several bands. Mr. Koza currently plays the bass in a rock band called "The Fall '85."
- 23. Mr. Koza currently works for the Town of Babylon Department of Public Works by day and pursues his art and music careers during his off hours.
- 24. Mr. Koza has long admired the music of the Wu-Tang Clan, and in late 2013 and early 2014, he rendered original portraits of nine members who recorded the group's first album.

- 25. The nine portraits are titled: "Ghostface Killa-Koza," "GZA-Koza," "Ol' Dirty Bastard-Koza," "Method Man-Koza," "Masta Killa-Koza," "Inspecta Deck-Koza," "U-God-Koza," "RZA-Koza," "Raekwon-Koza" (hereinafter the "Wu-Tang Clan Portraits").
- 26. The Wu-Tang Clan Portraits employ Mr. Koza's fanciful style, with each work incorporating comic-book-style depictions of the artists. For example, "Raekwon-Koza" depicts Wu-Tang Clan member Raekwon in a chef's uniform; a reference to his nickname "Raekwon the Chef."
- 27. In or around late 2013 or early 2014, Mr. Koza saw a solicitation on the WuDisciples.blogspot.com website stating as follows: "Every Thursday we will be posting up pics of Wu-Tang artwork from fans, artists and aliens. If you have artwork you would like to share, please email us at: WuArtTats@gmail.com."
- 28. Mr. Koza submitted digital images of his nine Wu-Tang Clan Portraits to the WuArtTats@gmail.com email address and the works were posted on the WuDisciples.blogspot.com website.
- 29. The WuDisciples.blogspot.com did not display any language or disclaimer granting the website a license for submitted works.
- 30. Mr. Koza did not grant an express license to the WuDisciples.blogspot.com for the use of his Wu-Tang Clan Portraits, although he intended that they be used for the limited purpose of public display on that website.
- 31. Mr. Koza did not authorize the use of his Wu-Tang Clan Portraits outside of the implied license he granted for their display on the WuDisciples.blogspot.com.
- 32. Upon information and belief, prior to 2014, Defendants Diggs and Azzougarh began work on a new Wu-Tang Clan album.
- 33. On April 8, 2014, Mr. Azzougarh emailed Mr. Koza and mentioned the new Wu-Tang Clan album that Mr. Azzougarh was working on with Mr. Diggs.¹

- 5 -

¹ Exhibit 1.

- 34. The last message Mr. Azzougarh sent in the exchange was: "Dont wanna ask you anything until after a meeting I have on thursday with some important folks. But I'm sure you've heard about the one copy album RZA and I doing. It's in relation to that."²
- 35. The last message Mr. Koza sent in the exchange was: "Fair enough. Looking forward to hearing from you! Let me know. Thanks. Jason."³
- 36. The April 2014 email exchange between Mr. Azzougarh and Mr. Koza did not include a request by Mr. Azzougarh for permission to copy, distribute, or publicly display Mr. Koza's Wu-Tang Clan Portraits.
- 37. Upon information and belief, in 2015, Mr. Diggs and Mr. Azzougarh completed production of a new Wu-Tang Clan album, which had been recorded secretly over the course of several years, titled "Once Upon a Time in Shaolin."
- 38. Upon information and belief, the album was sold with a leather-bound book containing, *inter alia*, unauthorized copies of all nine of Mr. Koza's Wu-Tang Clan Portraits.
- 39. Upon information and belief, Mr. Diggs and Mr. Azzougarh made, or caused to be made, the unauthorized copies of Mr. Koza's Wu-Tang Clan Portraits that were included in the leather-bound book.
- 40. Upon information and belief, in 2014 or 2015, Mr. Diggs and Mr. Azzougarh engaged New York-based online auction house Paddle8 as their agent to sell and/or distribute the "Once Upon a Time in Shaolin" album, including the leather-bound book that contains the infringing copies of Mr. Koza's artwork.
- 41. A December 9, 2015 Bloomberg Businessweek article features a picture of Mr. Diggs, Mr. Azzougarh, and a Paddle8 representative holding the ornate album case, the

³ *Id*.

² *Id*.

leather-bound book, and a document with wax seals in front of a window overlooking Manhattan's Central Park.

- 42. Upon information and belief, in 2015, Mr. Diggs, Mr. Azzougarh, and/or Paddle8, sold the album to Mr. Shkreli for approximately \$2 million and caused the album to be delivered, including the book containing the infringing copies of Mr. Koza's portraits, to a law office in Manhattan, where Mr. Shkreli retrieved it.
- 43. Upon information and belief, the album was unique in that only one copy was produced and Mr. Shkreli is contractually prohibited from distributing further copies commercially for 88 years following the sale.
- 44. On January 29, 2016, Mr. Koza saw an article published by Vice.com that included photographs of the leather-bound book that was included with the album.⁴
- 45. The pictures in the article revealed that at least three of Mr. Koza's Wu-Tang Clan Portraits were reproduced in the book: "Raekwon-Koza," "Ol' Dirty Bastard-Koza," and "Inspecta Deck-Koza." 5
- 46. Mr. Koza never gave his permission, express or implied, for any third party to copy, distribute, or publicly display copies of his works, other than his submission to the WuDisciples.blogspot.com website for the limited purpose of displaying the works thereon.
- 47. On January 31, 2016, Mr. Azzougarh emailed Mr. Koza with the following message, tacitly admitting the unauthorized nature of his use of Mr. Koza's work: "Hey Jason, I see we actually have been in touch before, but never completed. I thought we had. Let me know if you want to skype discussing the use of your drawings. Thanks bro. Ringz."

⁴ Conti, Allie, "Everything I Know About the Wu-Tang Album from Hanging Out with Martin Shkreli," Vice.com, Jan. 28, 2016 (last retrieved on Feb. 17, 2016 at: https://www.vice.com/read/everything-i-know-about-the-wu-tang-clan-album-from-hanging-out-with-martin-shkreli).

⁵ Compare Exhibit 2 (showing copies of the photographs from the Vice.com article), with Exhibit 3 (showing copies of Mr. Koza's original portraits).

⁶ Exhibit 1.

- 48. On February 1, 2016, Mr. Koza filed completed applications, paid the fees for the registration, and deposited of all nine of his Wu-Tang Clan Portraits with the United States Copyright Office.
- 49. The Copyright Office subsequently issued registration certificates for each of the Wu-Tang Clan Portraits.⁷
- 50. The Vice.com article notes that Mr. Shkreli has stated that he may destroy the album: "Shkreli told me he was thinking of destroying it—I wish I knew if he was kidding—so for the sake of historical record, I took a few photos of the album art and those aforementioned 'manuscripts' with my cell phone."

FIRST CAUSE OF ACTION: COPYRIGHT INFRINGEMENT

- 51. Mr. Koza repeats and realleges all paragraphs above as though fully set forth herein.
- 52. Mr. Koza owns the valid copyrights to the following works: "Ghostface Killa-Koza," "GZA-Koza," "Ol' Dirty Bastard-Koza," "Method Man-Koza," "Masta Killa-Koza," "Inspecta Deck-Koza," "U-God-Koza," "RZA-Koza," and "Raekwon-Koza."
- 53. Defendants have infringed and continue to infringe Mr. Koza's copyrights by copying, distributing, and publicly displaying his nine Wu-Tang Clan Portraits, without Mr. Koza's permission, license, or consent through their manufacture, sale, and exhibition of the book containing the infringing copies, in violation of the Federal Copyright Act, Title 17 of the U.S. Code.
- 54. Mr. Diggs and Mr. Azzougarh have infringed Mr. Koza's exclusive rights of reproduction, adaptation, and distribution through the acts of copying his nine Wu-Tang Clan

⁷ Exhibit 4.

⁸ Conti, Allie, "Everything I Know About the Wu-Tang Album from Hanging Out with Martin Shkreli," Vice.com, Jan. 28, 2016 (last retrieved on Feb. 17, 2016 at: https://www.vice.com/read/everything-i-know-about-the-wu-tang-clan-album-from-hanging-out-with-martin-shkreli).

Portraits from the digital images submitted to the WuDisciples.blogspot.com website, creating a work incorporating the portraits, and selling the work to a third-party without Mr. Koza's permission or license.

- 55. Paddle8 has infringed Mr. Koza's exclusive right of distribution by providing the infringing copies of the nine Wu-Tang Clan Portraits to Mr. Shkreli without Mr. Koza's permission or license.
- 56. Mr. Shkreli has infringed Mr. Koza's exclusive right of distribution and/or public display by permitting at least three of the nine Wu-Tang Clan Portraits to be copied and displayed to the public in a news article without Mr. Koza's permission or license.
 - 57. Defendants have infringed and continue to infringe Mr. Koza's works.
- 58. Upon information and belief, the infringement by Defendants was committed individually, jointly, contributorily and/or vicariously by and among said Defendants.
- 59. Defendants' infringement is and/or has been willful, deliberate, malicious and/or in reckless disregard of Plaintiff's rights.
- 60. As a result of Defendants' infringement, Plaintiff has been damaged in an amount yet to be ascertained.
- 61. As a result of Defendant's infringement, Plaintiff has been irreparably harmed and, absent a permanent injunction restraining and enjoining Defendants' actions, such irreparable harm will continue.
- 62. As a result of Defendants' infringement, Plaintiff is entitled to statutory damages, or actual damages plus Defendants' profits from infringement, as will be proven at trial.

SECOND CAUSE OF ACTION: BREACH OF IMPLIED-IN-FACT CONTRACT

63. Mr. Koza repeats and realleges all paragraphs above as though fully set forth herein.

- 64. The facts alleged regarding Mr. Koza's submission of the nine Wu-Tang Clan Portraits to the WuDisciples.blogspot.com website and the subsequent communications between Mr. Koza and Mr. Azzougarh give rise to an implied-in-fact contract for a license from Mr. Koza for use the nine Wu-Tang Clan Portraits in the album in exchange for payment from Defendants.
- 65. Mr. Koza performed his obligation under the implied contract by providing the nine Wu-Tang Clan Portraits.
- 66. Mr. Azzougarh, Mr. Diggs, and Paddle8 breached their obligation to provide consideration for Mr. Koza's license to use the nine Wu-Tang Clan Portraits in the album.
- 67. As a result of Defendants' breach of the implied contract, Mr. Koza has been damaged in an amount to be determined at trial.

THIRD CAUSE OF ACTION: DECLARATORY JUDGMENT

- 68. Mr. Koza repeats and realleges all paragraphs above as though fully set forth herein.
- 69. The facts set forth above present an actual case of controversy under 28 U.S.C. § 2201(a): whether Mr. Shkreli is in possession of infringing copies of Mr. Koza's portraits, and whether Mr. Koza is entitled to obtain injunctive relief against Mr. Shkreli pursuant to 17 U.S.C. §§ 502-503 to prevent further copying, distribution, and/or public display of the Wu-Tang Clan Portraits.
- 70. The facts set forth above further present an actual case of controversy under 28 U.S.C. § 2201(a) because Mr. Shkreli has already permitted copying of Mr. Koza's portraits by a third party, and may imminently further copy, distribute, and/or publicly display Mr. Koza's copyrighted works, in violation of Mr. Koza's exclusive rights under 17 U.S.C. § 101, et. seq.

- 71. The facts set forth above further present an actual case of controversy under 28 U.S.C. § 2201(a) because Mr. Shkreli has threatened to destroy the album, which is an important piece of evidence in Mr. Koza's infringement case.
- 72. Mr. Koza seeks a declaration from this Court declaring that that the copies of Mr. Koza's portraits made and/or distributed by Mr. Diggs, Mr. Azzougarh, and/or Paddle8 contained in the book accompanying the Once Upon a Time in Shaolin album were made and/or used in violation of Mr. Koza's exclusive rights under 17 U.S.C. § 101, et. seq.
- 73. Mr. Koza seeks a declaration from this Court declaring that continued possession of the infringing copies of Mr. Koza's works by Mr. Shkreli's presents a risk of further infringement by reproduction, distribution, and/or public display.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully request that this Court enter judgment against Defendants:

- A. That Defendants be held to have infringed Plaintiff's copyrights.
- B. That Defendants be held to have willfully infringed Plaintiff's copyrights.
- C. That Defendants be restrained and enjoined from infringing Plaintiff's copyrights in any manner.
- D. That Defendants be restrained and enjoined from creating, issuing, or distributing or otherwise publishing any copies of the nine Wu-Tang Clan Portraits that infringe Plaintiff's copyrights.
- E. That the infringing copies of Mr. Koza's portraits in Defendant Shkreli's possession be impounded, pursuant to 17 U.S.C. §§ 502-503, to prevent and/or restrain further violations of Mr. Koza's exclusive rights under 17 U.S.C. § 101, et. seq. and to prevent spoliation.

- F. That Defendants be ordered to pay Plaintiff the maximum statutory damages, or, in the alternative, Plaintiff's actual damages and any additional profits of Defendants attributable to Defendants' infringement.
- G. That Defendants Diggs and Azzougarh be held to have breached an implied-in-fact contract with Plaintiff.
- H. That Defendants Diggs, Azzougarh, and Paddle8 be ordered to pay Plaintiff the profits Defendants Diggs, Azzougarh, and Paddle8 have obtained from their breach of the agreement.
- I. That Defendants Diggs, Azzougarh, and Paddle8 be ordered to pay Plaintiff for the damages Plaintiff incurred as a result of Defendants Diggs, Azzougarh, and Paddle8's breach of the implied-in-fact agreement.
- J. That Defendants be ordered to pay Plaintiff's attorneys fees and costs of the action.
- K. That Defendants be ordered to pay pre-judgment interest.
- L. That Plaintiff be awarded such other and further relief as this Court may deem just and proper.

Date: February 25, 2016 Respectfully submitted,

/s/ Peter Scoolidge

Peter Scoolidge (PS7107)

Peter@ScoolidgeLLP.com

Joshua P. Kleiman (JK8764)

Josh@ScoolidgeLLP.com

SCOOLIDGE KLEIMAN LLP

315 West 36th Street

New York, NY 10018

Tel: (212) 913-9455

Tel: (212) 913-9455 Fax: (866) 344-5070

Attorneys for Plaintiff

Peter Scoolidge

From: Jason Koza <jaykoza@yahoo.com>
Sent: Sunday, January 31, 2016 7:46 PM

To: Peter Scoolidge

Subject: Fwd: Hey Jason, do u have skype to chat?

Sent from my iPhone

Begin forwarded message:

From: Tarik Azzougarh [RPEG Ltd] < info@rpeg-ltd.com>

Date: January 31, 2016 at 7:39:54 PM EST **To:** Jason Koza <jaykoza@yahoo.com>

Subject: RE: Hey Jason, do u have skype to chat?

Hey Jason,

I see we actually have been in touch before, but never completed. I thought we had. Let me know if you want to skype discussing the use of your drawings. Thanks bro.

Ringz

--

Mr. Tarik Azzougarh

The information in this email and its attachments is confidential. It is intended only for the named addressees and may not be disclosed to anyone else without our consent. If you are not the named addressees you must not use, disclose, distribute, copy, print or rely on the contents of this email. You should notify the sender and destroy the email immediately . Whilst we take care to protect our systems from electronic virus attack or other harmful event we give no warranty that this email message (including any attachments) is free of any virus or other harmful matter and accept no responsibility for any loss or damage resulting from the recipient receiving, opening or using it. If you need any further information please contact us through our website rege-ltd.com

----Original message-----

From: Jason Koza < jaykoza@yahoo.com > Sent: Tuesday 8th April 2014 5:21

To: Tarik Azzougarh < info@rpeg-ltd.com>

Subject: Re: Hey Jason, do u have skype to chat?

Fair enough. Looking forward to hearing from you! Let me know. Thanks. Jason

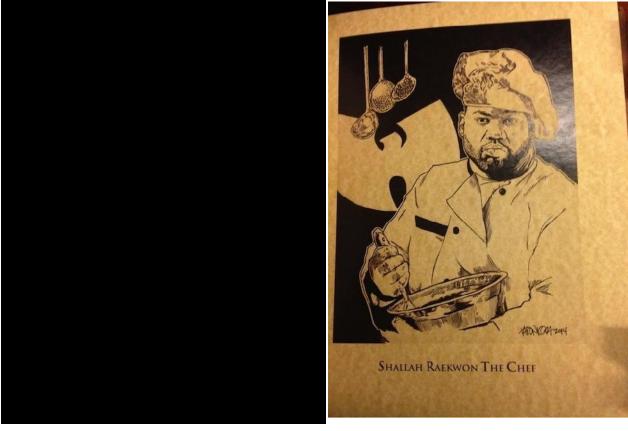
On Apr 8, 2014, at 1:11 AM, Tarik Azzougarh <info@rpeg-ltd.com> wrote:

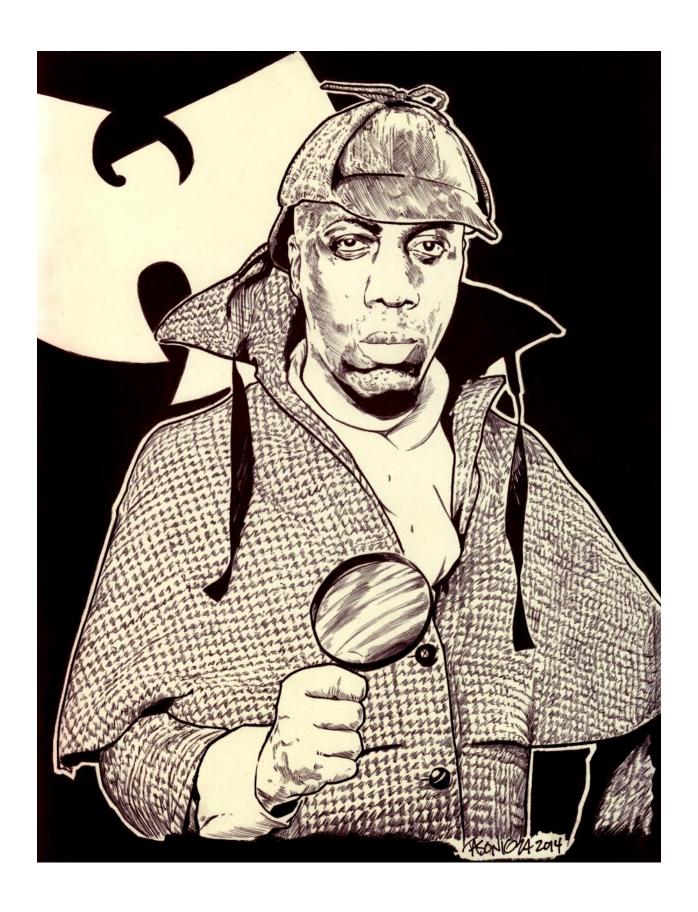
Hi jason,

Dont wanna ask you anything until after a meeting I have on thursday with some important folks. But I'm sure you've heard about the one copy album RZA and I doing. It's in relation to that.

```
----Original message-----
From: Jason Koza < jaykoza@yahoo.com>
Sent: Monday 7th April 2014 18:07
To: Tarik Azzougarh < <u>info@rpeg-ltd.com</u>>
Subject: Re: Hey Jason, do u have skype to chat?
What was the question?
On Apr 2, 2014, at 12:25 PM, Tarik Azzougarh <info@rpeg-ltd.com> wrote:
      Yes. I'll mail u a question in a sec
      Sent from my iPhone
      On 2 Apr 2014, at 16:24, "Jason Koza" <jaykoza@yahoo.com>
      wrote:
            No, I don't. Is this cilvaringz?
             -Jason
             > On Apr 2, 2014, at 12:20 PM,
             Tarik Azzougarh <info@rpeg-
             ltd.com> wrote:
             > Sent from my iPhone
```











Case 1:16-cv-00956-KMW Document 15 Filed 02/25/16 Page 24 of 32 Certificate of Registration



This Certificate issued under the seal of the Copyright Office in accordance with title 17, *United States Code*, attests that registration has been made for the work identified below. The information on this certificate has been made a part of the Copyright Office records.

Maria A. Pallante

United States Register of Copyrights and Director

Registration Number VAu 1-233-587

Effective Date of Registration: February 01, 2016

Title		
Title of Work:	Ghostface Killah-Koza	
Completion/Publication		
Year of Completion:	2013	
Author		
Domiciled in:	United States	
Copyright Claimant		
Copyright Claimant:	Jason Koza 600 Pinelawn Avenue, Copiague	
Certification		
Name: Date:	Peter Scoolidge February 01, 2016	

Case 1:16-cv-00956-KMW Document 15 Filed 02/25/16 Page 25 of 32 Certificate of Registration



This Certificate issued under the seal of the Copyright Office in accordance with title 17, *United States Code*, attests that registration has been made for the work identified below. The information on this certificate has been made a part of the Copyright Office records.

Maria A. Pallante

United States Register of Copyrights and Director

Registration Number
VAu 1-233-586
Effective Date of Registration:
February 01, 2016

Title		
Title of Work:	GZA-Koza	
Completion/Publication	12 C. TO S.	10a 9 50a 9 5
Year of Completion:	2014	
Author		
Author: Author Created: Citizen of: Domiciled in:	Jason Koza 2-D artwork United States United States	
Copyright Claimant		
Copyright Claimant:	Jason Koza 600 Pinelawn Avenue, Copiague	
Certification		
Name: Date:	Peter Scoolidge February 01, 2016	

Case 1:16-cv-00956-KMW Document 15 Filed 02/25/16 Page 26 of 32 Certificate of Registration



This Certificate issued under the seal of the Copyright Office in accordance with title 17, *United States Code*, attests that registration has been made for the work identified below. The information on this certificate has been made a part of the Copyright Office records.

Registration Number
VAu 1-233-581
Effective Date of Registration:

February 01, 2016

Title		
Title of Work:	Inspecta Deck-Koza	
Completion/Publication		
Year of Completion:	2014	
Author		
Author: Author Created: Citizen of: Domiciled in:	United States	
Copyright Claimant		
Copyright Claimant:	Jason Koza 600 Pinelawn Avenue, Copiague, NY	
Certification		
Name: Date:	Peter Scoolidge February 01, 2016	
Date.	1 coldary 01, 2010	

Case 1:16-cv-00956-KMW Document 15 Filed 02/25/16 Page 27 of 32 Certificate of Registration



This Certificate issued under the seal of the Copyright Office in accordance with title 17, *United States Code*, attests that registration has been made for the work identified below. The information on this certificate has been made a part of the Copyright Office records.

Registration Number
VAu 1-233-583
Effective Date of Registration:

February 01, 2016

Title		
Title of Work:	Masta Killa-Koza	
Completion/Publication		
Year of Completion:	2014	
Author		
Author: Author Created: Citizen of: Domiciled in:		
Copyright Claimant		
Copyright Claimant:	Jason Koza 600 Pinelawn Avenue, Copiague	
Certification		
Name: Date:	Peter Scoolidge February 01, 2016	

Case 1:16-cv-00956-KMW Document 15 Filed 02/25/16 Page 28 of 32 Certificate of Registration



This Certificate issued under the seal of the Copyright Office in accordance with title 17, *United States Code*, attests that registration has been made for the work identified below. The information on this certificate has been made a part of the Copyright Office records.

Registration Number
VAu 1-233-584

Effective Date of Registration: February 01, 2016

Title		
Title of Work:	Method Man-Koza	
Completion/Publication		<u> </u>
Year of Completion:	2013	
Author		50 C
• Author: Author Created: Citizen of: Domiciled in:	United States	
Copyright Claimant		
Copyright Claimant:	Jason Koza 600 Pinelawn Avenue, Copiague	
Certification		
Name:	Peter Scoolidge	
Date:	February 01, 2016	

Case 1:16-cv-00956-KMW Document 15 Filed 02/25/16 Page 29 of 32 Certificate of Registration



This Certificate issued under the seal of the Copyright Office in accordance with title 17, *United States Code*, attests that registration has been made for the work identified below. The information on this certificate has been made a part of the Copyright Office records.

Registration Number
VAu 1-233-585
Effective Date of Registration:
February 01, 2016

Title		5265266
Title of Work:	Ol' Dirty Bastard-Koza	
Completion/Publication		
Year of Completion:	2014	
Author		
Author: Author Created: Citizen of: Domiciled in:	2-D artwork United States	
Copyright Claimant		
Copyright Claimant:	Jason Koza 600 Pinelawn Avenue, Copiague, NY	
Certification		
Name: Date:	Peter Scoolidge February 01, 2016	

Case 1:16-cv-00956-KMW Document 15 Filed 02/25/16 Page 30 of 32 Certificate of Registration



This Certificate issued under the seal of the Copyright Office in accordance with title 17, *United States Code*, attests that registration has been made for the work identified below. The information on this certificate has been made a part of the Copyright Office records.

Registration Number
VAu 1-233-578
Effective Date of Registration:

February 01, 2016

Title of Work:	Paalguan Vaga	
Title of Work:	Raekwon-Koza	85, 625, 69
Completion/Publication	52655265526 55265 5265526552655265 56952696 96555265552655265526552655	<u> </u>
Completion abhoation		
Year of Completion:	2014	
Author		
• Author:	Jason Berrigan Koza	
Author Created:	2-D artwork	
	United States	
Domiciled in:	United States	
Copyright Claimant		
Copyright Claimant:	Jason Berrigan Koza	
	600 Pinelawn Avenue, Copiague, NY, United States	
Certification		
Name:	Peter Scoolidge	526252625
Date:	February 01, 2016	

Case 1:16-cv-00956-KMW Document 15 Filed 02/25/16 Page 31 of 32 Certificate of Registration



This Certificate issued under the seal of the Copyright Office in accordance with title 17, *United States Code*, attests that registration has been made for the work identified below. The information on this certificate has been made a part of the Copyright Office records.

Registration Number
VAu 1-233-579
Effective Date of Registration:
February 01, 2016

Title	
Title of Work:	RZA-Koza
Completion/Publication	
Year of Completion:	2014
Author	
Author: Author Created: Citizen of: Domiciled in:	Jason Koza 2-D artwork United States United States
Copyright Claimant	
Copyright Claimant:	Jason Koza 600 Pinelawn Avenue, Copiague
Certification	
Name: Date:	Peter Scoolidge February 01, 2016

Case 1:16-cv-00956-KMW Document 15 Filed 02/25/16 Page 32 of 32 Certificate of Registration



This Certificate issued under the seal of the Copyright Office in accordance with title 17, *United States Code*, attests that registration has been made for the work identified below. The information on this certificate has been made a part of the Copyright Office records.

Registration Number
VAu 1-233-580
Effective Date of Registration:

February 01, 2016

Title		
Title of Work:	U-God-Koza	
Completion/Publication);	
Year of Completion:	2014	
Author		
• Author: Author Created: Citizen of: Domiciled in:		
Copyright Claimant		
Copyright Claimant:	Jason Koza 600 Pinelawn Avenue, Copiague	
Certification		
Name: Date:	Peter Scoolidge February 01, 2016	